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July 26, 2019

VIA E-MAIL AND U.S. MAIL

David Eppler, Enforcement Officer
Superfund Enforcement Assessment Section (6SF-TE)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733
eppler.david@epa.gov

**Re: Section 104(e) Information Requests of Yazoo Valley Electric Power
Association**

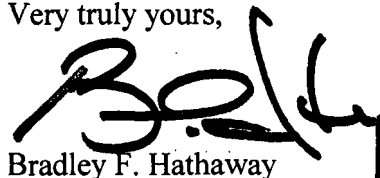
Dear Mr. Eppler:

Attached hereto you will find the responses of Yazoo Valley Electric Power Association to the U.S. EPA's information request concerning the F.J. Doyle Salvage Superfund Site.


Many thanks for your attention to this, and I invite you to contact me in the event you have any questions.

With kindest regards, I remain

Very truly yours,

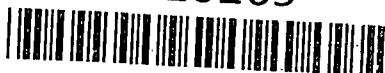


Bradley F. Hathaway



BFH/aw
Enclosure

9820269





**YAZOO VALLEY
ELECTRIC POWER ASSOCIATION**

P.O. BOX 8,
2255 Gordon Avenue
Yazoo City, MS 39194

TELEPHONE: (662) 746-4251
FAX: (662) 751-1061

July 26, 2019

VIA E-MAIL AND REGULAR U.S. MAIL

David Eppler, Enforcement Officer
Superfund Enforcement Assessment Section (6SF-TE)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733
eppler.david@epa.gov

**Re: Section 104(e) Information Requests of Yazoo Valley Electric Power
Association**

Dear Mr. Eppler:

Yazoo Valley Electric Power Association (“**Yazoo Valley**”) is responding to the EPA’s CERCLA Section 104(e) Information Requests concerning the F.J. Doyle Salvage Superfund Site. Our general objections, followed by responses to the separately numbered questions, are set forth below.

GENERAL OBJECTIONS

GENERAL OBJECTION NO. 1: Yazoo Valley objects to the EPA’s Information Request to the extent it exceeds the authority granted to the U.S. Environmental Protection Agency under Section 104(e) of CERCLA, 42 USC § 9604. As provided in Section 104(e)(1) of CERCLA, 42 USC § 9604(e)(1), the “authority of this subsection may be exercised only for the purposes of determining the need for response, or choosing to take any response action under this sub-chapter, or otherwise enforcing the provisions of this sub-chapter.”

GENERAL OBJECTION NO. 2: Yazoo Valley objects to the EPA’s Information Request to the extent it seeks information not relevant to the purposes stated in the EPA’s letter dated June 4, 2019. *See* CERCLA Section 104(e).

GENERAL OBJECTION NO. 3: Yazoo Valley objects to the EPA’s Information Request as overly broad, unreasonable in time and scope, and unduly burdensome.

Subject to and without waiver of these general objections:

1. Please provide the full legal name, mailing address, and phone number of the Respondent.

Yazoo Valley Electric Power Association
P.O. Box 8
Yazoo City, Mississippi 39194-0008
Telephone: (662) 746-4251.

2. For each person answering these questions on behalf of the Respondent, provide full name, title, business address, business telephone and facsimile number.

Michael Neely
Manager of General Services
2255 Gordon Avenue
Yazoo City, MS 39194
Telephone: 662-751-8000 x-8059
Fax: 662-751-1060

3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, and facsimile number.

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4. Has any material or equipment owned or used by Respondent ever been sold to, supplied to, or otherwise turned over to FJ Doyle for scrapping, salvage, repair, consignment, resale or any other purpose?

Based on currently available information, Yazoo Valley has found no information indicating that it sold to, supplied to, or otherwise turned over to F.J. Doyle any material or equipment for scrapping, salvage, repair, consignment, resale or any purpose.

5. Has any material or equipment owned or used by Respondent ever been sent to the Site for scrapping, salvage, repair, consignment, resale, or any other purpose?

Based on currently available information, Yazoo Valley has found no information indicating that any material or equipment owned or used by it was sent to the Site for scrapping, salvage, repair, consignment, resale, or other purpose.

6. If your answer to either or both questions is yes, provide a complete list of all such material or equipment, as well as any and all shipments thereof; including the following information with your response:

a. The reason and approximate date(s) the material or equipment was taken out of service, and the date(s) sold, scrapped, disposed of, or otherwise turned over to FJ Doyle, or the date sent to the Site, if applicable.

b. Describe the condition of the material or equipment when it was sold, scrapped, disposed of, or otherwise turned over to FJ Doyle, or sent to the Site, if applicable.

c. List any amount of money paid or received by Respondent in relation to the sale, transfer, or delivery of the material or equipment. Indicate whether the price was reduced because of the inclusion of hazardous substances in the material or equipment.

d. For each item of material or equipment, indicate whether it contained any oil when turned over to FJ Doyle. Supply any and all records that may indicate the contents of the oil, in particular whether to oil may have contained any PCBs. Indicate what steps were taken to determine whether the oil contained PCBs at the time of taking out of service or of disposal, and explain what precautions were taken to ensure that any PCBs in the equipment were disposed of properly.

e. Supply all documents pertaining to the transaction, and to the movement or shipment of the material or equipment from your property, or from property where you operate.

f. For each instance of equipment or material turned over to FJ Doyle or sent to the Site, indicate whether the equipment or material was transported by FJ Doyle, or by a separate company. In the case of the latter, identify both the individual and the company supplying the transportation services.

g. Identify all persons who controlled and/or transported the material or equipment prior to delivery to the Site. Include job title, duties, dates performing those duties, supervisors for those duties, current position, and if applicable, the date of the individual's resignation or termination.

h. Provide the correct name and addresses of Respondent's plants and other facilities from which Respondent sold or supplied equipment or material to FJ Doyle or otherwise sent equipment or material to the Site.

i. Provide a brief description of the nature of Respondent's operations at each plant or facility referenced above, including: the date such operations commenced and concluded; and types of work performed at each plant or facility, including but not limited to the industrial, chemical, or institutional processes and treatments undertaken at each plant or facility.

Not applicable in view of the Responses to Request Nos. 4 and 5 above.

7. List, describe, and provide all documents relating to the information requested above. If any such documents have been destroyed, provide the dates of destruction.

As this request is understood, it is not applicable in view of the Responses to Request Nos. 4 and 5 above. Based on currently available information, Yazoo Valley has found no documents responsive to this request and it has not found any information indicating that responsive documents were destroyed.

8. Did Respondent ever sell or supply transformers or any other oil-containing equipment to FJ Doyle or otherwise send transformers or any other oil-containing electrical equipment to the Site? If so, provide the following details for each item that was sold or supplied to FJ Doyle or may have been sent to the Site:

- a. the name of the manufacturer and serial number;**
- b. the quantity of oil contained in the equipment;**
- c. the concentration of PCBs contained in the oil;**
- d. the purpose of the shipment(e.g, salvage, repair or resale);**
- e. the date on which the equipment left your facility;**
- f. the company name, address, and telephone numbers, and dates of ownership of any and all prior owners.**

Based on currently available information, Yazoo Valley has found no information indicating that it sold or supplied transformers or any other oil-containing equipment to F.J. Doyle or otherwise sent transformers or any other oil-containing electrical equipment to the Site.

9. Provide legible copies of any and all contracts, invoices, receipts, or other documents describing the transactions that Respondent implemented with FJ Doyle for each item identified in the question above.

Based on currently available information, Yazoo Valley has found no documents responsive to this request. *See Response to Request No. 8 above.*

10. Provide legible copies of any and all contracts, invoices, receipts, or other documents related to the transactions that Respondent implemented with transporters to transport the items in the question above.

Based on currently available information, Yazoo Valley has found no documents responsive to this request. *See Responses to Request Nos. 8 and 9 above.*

11. Describe how both PCB-contaminated oil and uncontaminated oil were emptied from electrical transformers and capacitors or other electrical equipment and stored at Respondent's facilities.

Based on currently available information, Yazoo Valley has found no information indicating that it emptied PCB-contaminated oil and uncontaminated oil from electrical transformers and capacitors or other electrical equipment and stored same at its facilities.

12. Identify and describe, and provide all documents that refer or relate to, the following:

a. How were hazardous substances or materials containing hazardous substances used or planned to be used at the Site?

Based on currently available information, Yazoo Valley has found no information or documents indicating knowledge of how hazardous substances or materials containing hazardous substances were used or planned to be used at the Site; therefore, Yazoo Valley cannot identify or provide any documents responsive to this request.

b. What was done to any hazardous substances once they were sent to the Site, including any service, repair, recycling, treatment, or disposal?

Based on currently available information, Yazoo Valley has found no information or documents indicating that it sent hazardous substances to the Site; therefore, Yazoo Valley cannot identify or provide any documents responsive to this request.

c. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?

Based on currently available information, Yazoo Valley has found no information or documents indicating knowledge of activities or common business practices at the Site; therefore, Yazoo Valley cannot identify or provide any documents responsive to this request.

d. How were hazardous substances typically used, handled or disposed of at the Site?

Based on currently available information, Yazoo Valley has found no information or documents indicating knowledge of how hazardous substances were typically used, handled or disposed of at the Site; therefore, Yazoo Valley cannot identify or provide any documents responsive to this request.

e. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? When traveling to the Site, explain the details of the visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.

Based on currently available information, Yazoo Valley has found no information indicating that it ever traveled to the Site.

f. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?

Based on currently available information, Yazoo Valley found no information or documents indicating knowledge that hazardous substances were disposed of at the Site; therefore, Yazoo Valley cannot identify or provide any documents responsive to this request.

g. Did Respondent have any influence over waste disposal activities at the Site? If so, how?

Yazoo Valley did not have any influence over waste disposal activities at the Site.

h. Did Respondent know if the owner(s) and/or operator(s) of the Site were removing a hazardous substance from the transferred material?

Based on currently available information, Yazoo Valley found no information indicating that it transferred hazardous substance-containing material to the Site and, therefore, it has no information or documents indicating knowledge that the owner and/or operator of the Site were removing a hazardous substance.

I. Did Respondent know, based on general industry knowledge, if the hazardous substances would need to be removed from the transferred material in order for that material to be useful?

Based on currently available information, Yazoo Valley found no information indicating that it transferred hazardous substance-containing material to the Site and, therefore, it has no information or documents indicating knowledge that hazardous substances would need to be removed from any material at the Site in order for that material to be useful.

j. What percentage of Respondent's total hazardous substances went to the Site?

Based on currently available information, Yazoo Valley found no information indicating that any of its hazardous substances went to the Site.

k. What steps did Respondent take to dispose of or treat any hazardous substances among the materials transferred to the Site? Provide any agreements and documents, including waste logs, journals, or notes reflecting these steps.

Based on currently available information, Yazoo Valley found no information indicating that it transferred any materials to the Site; therefore, Yazoo Valley cannot identify or provide any documents responsive to this request.

l. What involvement (if any) did Respondent have in selecting the particular means and method of disposal of the hazardous substances at the Site?

Yazoo Valley did not have any involvement in selecting the particular means and method of disposal of any hazardous substances at the Site

m. At the time Respondent transferred the materials containing hazardous substances to the Site, what did Respondent intend to happen to the hazardous substances? Provide any agreements and documents, including waste logs, journals, or notes, reflecting the intention of the parties. If Respondent does not have such documents and/or materials, please so state.

Based on currently available information, Yazoo Valley found no information indicating that it transferred materials containing hazardous substances to the Site; therefore, Yazoo Valley cannot identify or provide any documents responsive to this request.

n. With respect to all arrangements involving materials containing hazardous substances, at the time of the arrangement, specify the measures Respondent took to determine the actual means or treatment, disposal or other uses of hazardous substances at the Site. Provide information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owners/operators at the Site regarding the proper handling and ultimate disposition of the materials Respondent sent there?

Based on currently available information, Yazoo Valley found no information indicating (1) that it had an arrangement involving materials containing hazardous substances to be treated or disposed of at the Site and/or (2) that it had information about the treatment and disposal practices at the Site; therefore, Yazoo Valley cannot identify or provide any documents responsive to this request.

o. What efforts, if any, did Respondent take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering (e.g., for repair, consignment, or joint-venture), disposing of, or arranging for the treatment or disposal of any hazardous substances.

Based on currently available information, Yazoo Valley found no information indicating that it sold, transferred, delivered, disposed of, or arranged for the treatment or disposal of hazardous substances at the Site; therefore, Yazoo Valley cannot identify or provide any documents responsive to this request.

p. How long did Respondent have a relationship with the owner(s) and/or operator(s) of the Site?

Based on currently available information, Yazoo Valley found no information indicating it had a relationship with the owner(s) and/or operator(s) of the Site.

q. Provide names, addresses, telephone numbers, and email addressed of any individuals, including former and current employees, who may be knowledgeable of Respondent's operations and practices concerning the handling, storage and disposal of hazardous substances at the Site.

Based on currently available information, Yazoo Valley's operations and practices did not concern the handling, storage and disposal of hazardous substances at the Site, and it lacks knowledge of the identity of any individuals knowledgeable of the handling, storage and disposal of hazardous substances at the Site.

13. If any documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

Based on currently available information, Yazoo Valley found no information indicating that it previously possessed solicited documents which are no longer available and, therefore, lacks knowledge responsive to this request other than as stated.

14. If you believe there may be any person(s) able to provide a more detailed or complete response to any of the preceding questions and/or sub-questions or any person(s) who may be able to provide additional responsive documents, please identify such person(s) and the additional information you believe they may have.

Because Yazoo Valley has been unable to find any information indicating a relationship with F.J. Doyle, it lacks knowledge of whether there may be any person(s) responsive to this request.

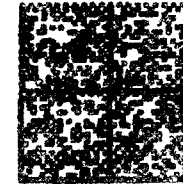
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